

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
COLUMBIA DIVISION

BRANDON FRAZIER,
Plaintiff,

Vs.

ENOCH GEORGE, sheriff of Maury County
LT. DEBRA WAGONSHUTZ,
FLOYD SEALEY,
MAURY REGIONAL MEDICAL
CENTER, ABL MANAGEMENT, INC,
and GENELLA POTTER,

Defendants.

NO: 1:12-cv-0128
Judge Haynes
JURY DEMAND

DK124K
This motion
NO GRANTED
See [signature]
1/20/14
4-14-14

MOTION TO ORDER ABL MANAGEMENT, INC. AND GENELLA POTTER NOT TO
DESTROY PRODUCTION RECORDS

Comes now the Plaintiff, Brandon Frazier ("Plaintiff"), and moves the Court to order ABL Management, Inc. ("ABL") and Genella Potter not to destroy production records. There are other cases involving conditions of the Maury County Jail that have been stayed by this court. (Case 1:12-cv-145, Document 18) It was discovered in the recent 30(b)(6) deposition of ABL Management, Inc. that ABL destroys production records of meals served after 6 months. These records may be relevant regarding the issue of whether inmates are receiving sufficient food. The destruction of these records may result in the destruction of evidence. A Memorandum is filed herewith as grounds for this Motion.

WHEREFORE, Plaintiff prays that ABL Management, Inc. and Genella Potter be ordered not to destroy production records for Maury County Jail in the future pending the completion of the instant cases and the stayed cases against the Maury County Sheriff or Maury County Jail and ABL.

Plaintiff reserves the right to allege the destruction of the past production records as spoliation of evidence.